

1 ROBERT M. SCHWARTZ (S.B. #117166)
rschwartz@omm.com

2 CASSANDRA L. SETO (S.B. #246608)
cseto@omm.com

3 BRIAN J. FINKELSTEIN (S.B. #261000)
brianfinkelstein@omm.com

4 O'MELVENY & MYERS LLP
1999 Avenue of the Stars, 7th Floor
5 Los Angeles, California 90067-6035
Telephone: (310) 553-6700

6 MARC A. BECKER (S.B. #138872)
marchecker@quinnemanuel.com

7 QUINN EMANUEL URQUHART
8 & SULLIVAN, LLP
865 S. Figueroa Street, 10th Floor
9 Los Angeles, California 90017
Telephone: (213) 443-3000

10 Attorneys for Plaintiffs

11
12 **UNITED STATES DISTRICT COURT**

13 **CENTRAL DISTRICT OF CALIFORNIA**

14 DANJAQ, LLC, a Delaware limited
liability company; METRO-
15 GOLDWYN-MAYER STUDIOS
INC., a Delaware corporation;
16 UNITED ARTISTS CORPORATION,
a Delaware corporation; SEVENTEEN
17 LEASING CORPORATION, a
Delaware corporation; EIGHTEEN
18 LEASING CORPORATION, a
Delaware corporation; NINETEEN
19 LEASING CORPORATION, a
Delaware corporation; TWENTY
20 LEASING CORPORATION, and a
Delaware corporation; TWENTY-ONE
21 LEASING COMPANY LLC, a
Delaware limited liability company,

22 Plaintiffs,

23 vs.

24 UNIVERSAL CITY STUDIOS LLC, a
Delaware limited liability company;
25 NBCUNIVERSAL MEDIA, LLC, a
Delaware limited liability company;
26 and AARON BERG, an individual,

27 Defendants.
28

Case No. 2:14-cv-02527 DDP-Ex

**STIPULATION TO MODIFY THE
BRIEFING SCHEDULE FOR
DEFENDANTS' MOTIONS TO
DISMISS**

**[PROPOSED] ORDER FILED
HEREWITH**

Judge: Hon. Dean D. Pregerson
Magistrate: Hon. Charles F. Eick

1 1. Plaintiffs filed the complaint in this matter on April 3, 2014. *See*
2 Docket No. 1.

3 2. Plaintiffs served the summons and complaint on defendants Universal
4 City Studios LLC and NBCUniversal Media, LLC (collectively, “Universal”) on
5 April 3, 2014, and on defendant Aaron Berg on April 16, 2014. *See* Docket Nos.
6 12, 13, 20.

7 3. On April 18, 2014, at defendants’ request, the parties filed a joint
8 stipulation to extend defendants’ deadline to file their responsive pleadings to May
9 27, 2014. *See* Docket No. 18. The Court entered an order granting the stipulation
10 on April 21, 2014. *See* Docket No. 19.

11 4. Universal filed a motion to dismiss plaintiffs’ complaint on May 27,
12 2014. *See* Docket No. 24. Berg filed a separate motion to dismiss plaintiffs’
13 complaint on the same day. *See* Docket No. 22.

14 5. Both motions are currently scheduled for a hearing on June 30, 2014.
15 Plaintiffs’ deadline to oppose defendants’ motions to dismiss is currently June 9,
16 2014. Defendants’ deadline to file replies in support of their motions to dismiss is
17 currently June 16, 2014.

18 6. The parties have agreed that, in consideration of certain scheduling
19 accommodations required by the parties and their counsel, good cause exists to
20 modify the briefing schedule for defendants’ motions to dismiss.

21 7. Accordingly, subject to the Court’s acceptance of this stipulation by
22 entry of the proposed Order filed herewith, the parties hereby stipulate as follows:

23 a. Plaintiffs shall have until Wednesday, June 25, 2014, to file their
24 oppositions to defendants’ two motions to dismiss.

25 b. Defendants shall have until Friday, July 11, 2014, to file their
26 replies in support of defendants’ two motions to dismiss.

1 c. The parties respectfully request that the hearing on defendants'
2 two motions to dismiss be held on Monday, July 28, 2014, subject to the
3 Court's consent and availability.

4 d. Defendants may not refer to or otherwise rely on this extension
5 of time as grounds to oppose any request plaintiffs may seek with regard to
6 provisional relief (including a preliminary injunction) or case management
7 (including the schedule for discovery).

8
9 Dated: June 3, 2014

O'MELVENY & MYERS LLP

10
11 By: /s/ Robert M. Schwartz.
Robert M. Schwartz
Attorneys for Plaintiffs

12
13 Dated: June 3, 2014

GREENBERG GLUSKER FIELDS
CLAMAN & MACHTINGER LLP

14
15 By: /s/ Aaron Moss.
Aaron Moss
Attorneys for Defendants Universal City
16 Studios LLC and NBCUniversal Media,
17 LLC

18 Dated: June 3, 2014

LATHROP & GAGE LLP

19
20 By: /s/ David Aronoff.
David Aronoff
Attorneys for Defendant Aaron Berg

21 **ATTESTATION**

22 I hereby attest that the other signatories listed, on whose behalf this filing is
23 submitted, concur in the filing's content and have authorized the filing.

24 Dated: June 3, 2014

O'MELVENY & MYERS LLP

25
26 By: /s/ Robert M. Schwartz.
Robert M. Schwartz
27 Attorneys for Plaintiffs
28